

FILED**12/3/2024****THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA

v.

RAMON EDUARDO ALCANTAR

CASE NUMBER: 24CR553

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about March 31, 2024, at Aurora, in the Northern District of Illinois, Eastern Division, the defendant(s) violated:

*Code Section*Title 18, United States Code,
Section 2252A(a)(2)(A)*Offense Description*

knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, and which image had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

This criminal complaint is based upon these facts:

X Continued on the attached sheet.

/s/ Shonnisha Davis (by SH)

SHONNISHA DAVIS

Special Agent, Federal Bureau of Investigation
(FBI)

Pursuant to Fed. R. Crim. P. 4.1, this Complaint is presented by reliable electronic means. The above-named agent provided a sworn statement attesting to the truth of the Complaint and Affidavit by telephone.

Date: December 3, 2024

Sheila Finnegan
Judge's signature

City and state: Chicago, Illinois

SHEILA FINNEGAN, U.S. Magistrate Judge

Printed name and title

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

AFFIDAVIT

I, SHONNISHA DAVIS, being duly sworn, state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed since approximately June 2023.

2. As part of my duties as an FBI Special Agent, I investigate criminal violations related to child exploitation and child pornography, including violations pertaining to the illegal distribution, receipt, and possession of child pornography, in violation of Title 18, United States Code, Sections 2251, 2252, and 2252A. I have received training in the areas of child pornography and child exploitation, and have observed and reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in multiple forms of media, including computer media.

3. This affidavit is submitted in support of a criminal complaint alleging that RAMON EDUARDO ALCANTAR has violated Title 18, United States Code, Section 2252A(a)(2)(A). Because this affidavit is being submitted for the limited purpose of establishing probable cause in support of a criminal complaint charging ALCANTAR with receipt of child pornography, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that the defendant committed the offense alleged in the complaint.

4. This affidavit is based on my personal knowledge, information provided to me by other law enforcement agents, information from persons with knowledge regarding relevant facts, my own observations and actions, my experience and training, the experience of other agents, witness interviews, records obtained during the course of the investigation, and information obtained from the execution of a court-authorized search warrant.

I. FACTS SUPPORTING PROBABLE CAUSE

A. Summary of Probable Cause

5. In summary, and as set forth more fully below, RAMON EDUARDO ALCANTAR utilized a Snapchat account (the “Suspect Snapchat Account”) to solicit and receive multiple images and videos constituting Child Sexual Abuse Material (“CSAM”) from multiple minor victims. Law enforcement previously obtained and executed a search warrant for the Suspect Snapchat Account, the returns of which revealed at least 97 images and 47 videos dated between approximately February 2023 and May 2024 that were either (i) indicative of CSAM received by the Suspect Snapchat Account, or (ii) depicted obscene material sent by the Suspect Snapchat Account to other Snapchat accounts, including accounts believed to be controlled by multiple minor victims. Law enforcement further identified multiple instances of ALCANTAR requesting sexually explicit images from minor victims and falsely stating that he was between 14 and 19 years old. A combination of images recovered from the Suspect Snapchat Account, responses to multiple administrative

subpoenas, and ALCANTAR's own statements revealed that ALCANTAR is the user of the Suspect Snapchat Account.

6. On December 3, 2024, law enforcement executed a search warrant at ALCANTAR's residence.¹ During execution of the search warrant, ALCANTAR admitted to controlling the Suspect Snapchat Account, using the Suspect Snapchat Account to communicate with victims he knew to be minors, asking for and receiving sexually explicit images and videos from victims he knew to be minors, and that he deleted his Snapchat application and images saved on his cellular phone when he heard law enforcement at the Aurora Residence.

B. Snapchat User Account "edluvvv" Solicits and Receives CSAM

7. On or about February 20, 2024, FBI Oklahoma City – Muskogee Resident Agency ("FBI OC/MRA") initiated an investigation regarding potential exploitation of minor Victim A. As of February 20, 2024, Victim A was 15 years old.

8. According to FBI OC/MRA, agents initiated the investigation after receiving information from other law enforcement officers that Victim A distributed CSAM over Snapchat and other social media platforms. Specifically, according to FBI OC/MRA, Victim A's mother alerted local law enforcement that Victim A had engaged in a relationship with an older male that resulted in Victim A sending

¹ On or about November 26, 2024, the Honorable Keri L. Holleb Hotaling issued search warrants for (1) 1381 Golden Oaks Parkway, Aurora, Illinois (the "Aurora Residence") and (2) ALCANTAR's person, authorizing the search of the same for evidence, instrumentalities, fruits, and contraband concerning violations of Title 18, United States Code, Sections 2251, 2252, and 2252A. *See* 24 M 926 and 24 M 927.

CSAM via social media. Law enforcement visited Victim A and ultimately referred the matter to FBI OC/MRA.

9. On February 21, 2024, FBI OC/MRA forensically interviewed Victim A. Victim A consented to a search by FBI OC/MRA of the cellular phone Victim A had used to distribute CSAM. During this search, FBI OC/MRA searched the contents of the Snapchat application downloaded to Victim A's cellular phone. While reviewing these contents, FBI OC/MRA observed a user named "Eddy" using username "edluvvv" (the "Suspect Snapchat Account") had messaged Victim A on Snapchat. During the interview, Victim A said that the user of the Suspect Snapchat Account said he was 14 years old. Victim A also said that she sent videos depicting her fingers inserted into her vagina at the request of the user of the Suspect Snapchat Account. Victim A also related that the user of the Suspect Snapchat Account discussed coming to meet Victim A in person, but Victim A never met the user of the Suspect Snapchat Account. While reviewing the contents of Victim A's Snapchat account, FBI OC/MRA observed a message in which the user of the Suspect Snapchat Account messaged Victim A "[a]nd I'm allowed to empty my balls in you?"

10. On or about June 7, 2024, Magistrate Judge Gerald L. Jackson for the Eastern District of Oklahoma issued a search warrant (the "Snapchat Warrant") for the Suspect Snapchat Account, authorizing law enforcement to search the same for evidence and contraband concerning violations of Title 18, United States Code,

Sections 2251 and 2252, among other statutes. *See* 24 MJ 185 GLJ (E.D. Okla. June 7, 2024).

11. On or about June 10, 2024, FBI OC/MRA executed the Snapchat Warrant. Thereafter, FBI OC/MRA agents reviewed the return for the Snapchat Warrant. The reviewing agents did not locate any evidence depicting Victim A in their review. However, the reviewing agents identified multiple images and videos constituting CSAM within the Suspect Snapchat Account. Among other things, agents observed multiple sexually explicit videos depicting a minor female that the Suspect Snapchat Account received from another Snapchat account.

12. Based on my review of the returns of the Snapchat Warrant, I identified other instances of the Suspect Snapchat Account receiving and saving CSAM. Based on my training and experience and the investigation to date, I believe the received dates of the images below are contained in the file name of the images, for example, image in paragraph 12.b. below, which contains “2024-03-31” in the file name, was received by the Subject Snapchat Account on or about March 31, 2024. Among other examples, I observed the following images and video saved within the Suspect Snapchat Account:

a. Image, from Victim B, titled snap~media_v4~2023-08-31-21-10-24UTC~ermumokay~edluvvv~saved~b~EiQSFVpZclBpRXNpWkNUZVlaN3hqazlVRxoAGgAyAQNIAlAEYAE~v4.jpeg, depicts a minor prepubescent victim sitting on the floor of what appears to be a bedroom. The image depicts the minor victim with

her shirt lifted, fully exposing her breast. The image further depicts the minor victim naked from the waist down and using her fingers to spread her vagina.

b. Image, from Victim C, titled snap~media_v4~2024-03-31-19-48-43UTC~ashy_washy11~edluvvv~saved~b~EiQSFXRPEndndG5lNkFaNDU4M0dyWXNBTxoAGgAyAQNIAlAEYAE~v4.jpeg, depicts a close-up image of a Crayola marker being inserted into a minor victim's vaginal area. Victim C also sent the user of the Suspect Snapchat Account multiple "selfies" that depict Victim C's face. Based on my review of those images and video, I believe Victim C is a minor female, approximately 7-12 years old, because of her facial features, lack of breast development, lack of pubic hair, and the size of her arms, legs, and torso.

c. Video, from Victim C, titled snap~media_v4~2024-04-22-07-20-58UTC~ashy_washy11~edluvvv~saved~b~EiQSFUILQlZRcGF1b01pdDlwYnBhcUNNVBoAGgAyAVJlAlAEYAE~v4.mp4, is approximately 10 seconds long and depicts a naked minor prepubescent victim laying across what appears to be a couch and inserting an object into her vagina.

d. Image, from Victim C, titled snap~media_v4~2024-04-22-07-28-16UTC~ashy_washy11~edluvvv~saved~b~EiQSFVc1S0Y3ZTZOemM2cWwwV29TTUtaMRoAGgAyAVJlAlAEYAE~v4.jpeg, depicts an object inserted into a minor victim's vaginal area. Text across the image reads "I feel like this pain is better than the pain trying in the []other hole."

e. Image, from Victim C, titled snap~media_v4~2024-04-19-23-11-34UTC~ashy_washy11~edluvvv~saved~b~EiQSFUI5NnVBWVBaVjF6TWRBcjJ3d

DFXWhoAGgAyAQFIA1AEYAE~v4.jpeg, depicts a female carving the letter “E” into her thigh with a knife.

13. Based on my review of the returns of the Snapchat Warrant, I identified multiple images of the user of the Suspect Snapchat Account taking photographs of himself that portray the user’s face, either in a “selfie” format or by using a mirror. I also identified instances of the user of the Suspect Snapchat Account sending images and videos depicting himself and his penis, including on or about September 25, 2023, and May 27, 2024, to other Snapchat accounts.

14. Based on my review of the returns of the Snapchat Warrant, I identified multiple instances of the user of Suspect Snapchat Account asking other Snapchat accounts for nude images and videos.

15. According to Illinois Secretary of State records, ALCANTAR is 26 years old.

16. Based on my review of the returns of the Snapchat Warrant, I identified multiple instances of the user of the Suspect Snapchat Account stating to other Snapchat users that the user of the Suspect Snapchat Account’s age was between 14 and 19 years old. Among other examples, I observed the following messages sent by the user of the Suspect Snapchat Account:

a. A message thread on or about March 9, 2024, with Victim C, during which the user of the Suspect Snapchat Account messaged “[c]uz I’m 16 idk if that okay with u.”

b. A message thread on or about March 12, 2024, with Victim D, during which the user of the Suspect Snapchat Account messaged “16” in response to Victim D asking the user how old he was. Victim D replied to the user of the Suspect Snapchat Account that Victim D was 13 years old. The user of the Suspect Snapchat Account responded “3 year difference” and “[i]s that bad?”

c. A message thread on or about April 19, 2024, with Victim E, during which the user of the Suspect Snapchat Account asked Victim E how old Victim E was. Victim E messaged “14,” to which the user of the Suspect Snapchat Account responded “[o]h so a baby,” “I’m 17,” and “I mean I look like I’m 22 but I’m 17.”

d. A message thread on or about May 11, 2024, with Victim F, during which the user of the Suspect Snapchat Account asked Victim F how old Victim F was. Victim F messaged “15 u,” to which the user of the Suspect Snapchat Account responded “[o]h okay I’m 16.”

e. A message thread on or about May 29, 2024, with Victim G, during which the user of the Suspect Snapchat Account messaged “15” in response to Victim G asking the user how old he was.

C. Law Enforcement Identifies ALCANTAR as the User of the Suspect Snapchat Account and ALCANTAR Admits to Receiving CSAM

17. In summary, and as described further below, law enforcement identified ALCANTAR as the user of the Suspect Snapchat Account based on images sent by the Suspect Snapchat Account that appear to depict ALCANTAR,

associations with other accounts appearing to be connected to ALCANTAR, and ALCANTAR's statements to law enforcement during execution of the Aurora Residence search warrant.

1. Images of ALCANTAR Sent by the Suspect Snapchat Account

18. As stated above, I reviewed multiple instances of the user of the Suspect Snapchat Account sending images and videos appearing to depict the user's face due to their format as "selfie" style images or being taken using a mirror. I compared those images to Illinois Secretary of State records, specifically, the Illinois Driver's License photograph for ALCANTAR. The individual depicted in ALCANTAR's Illinois Driver's License photograph appears to match the individual depicted in the images and videos sent by the user of the Suspect Snapchat Account.

2. Associations Between the Suspect Snapchat Account and Other Accounts Appearing to be Connected to ALCANTAR

19. According to Snap records, the user of the Suspect Snapchat Account used email address "edwardchann95@gmail.com" to open the Suspect Snapchat Account.

20. According to Snap records, phone number XXX-XXX-5931 is the recovery phone number for the Suspect Snapchat Account. According to Google records, this phone number is also the recovery phone number for email address "edwardchann95@gmail.com."

21. According to AT&T records, phone number XXX-XXX-5931 is subscribed to Individual A. Based on my review of law enforcement and public-

source databases, I believe Individual A is ALCANTAR's mother because she shares ALCANTAR's last name and ALCANTAR confirmed Individual A is his mother during execution of the search warrant at the Aurora Residence.

22. In addition, according to Snap records, phone number XXX-XXX-5931 is also the recovery phone number for Snapchat account "eddaddy01." According to Snap records, the user of this Snapchat account used email address "eduardoalcantar1995@gmail.com" to open this Snapchat account.

3. Law Enforcement Executes Search Warrants on the Aurora Residence and ALCANTAR

23. On or about November 26, 2024, the Honorable Keri L. Holleb Hotaling issued search warrants for (1) the Aurora Residence and (2) ALCANTAR's person, authorizing the search of the same for evidence, instrumentalities, fruits, and contraband concerning violations of Title 18, United States Code, Sections 2251, 2252, and 2252A. *See* 24 M 926 and 24 M 927.

24. On or about December 3, 2024, law enforcement executed the search warrants. ALCANTAR was present during execution of the search warrant for the Aurora Residence.

25. During execution of the search warrant for the Aurora Residence, ALCANTAR voluntarily agreed to speak with law enforcement regarding his knowledge of the Suspect Snapchat Account. During this voluntary interview, ALCANTAR made the following statements, in summary and not verbatim:

a. ALCANTAR admitted to using and controlling the Suspect Snapchat Account, as well as the phone number registered as the recovery phone

number for the Suspect Snapchat Account. ALCANTAR further stated that he created a new Snapchat account because the Suspect Snapchat Account was banned by Snapchat.

b. ALCANTAR admitted to using the Suspect Snapchat Account to communicate with individuals he knew to be minors, ranging from 14 to 17 years old.

c. ALCANTAR admitted to using the Suspect Snapchat Account to receive sexually explicit images and videos from individuals he knew to be minors. ALCANTAR stated he requested provocative pictures, but that he did not request pictures of the victims' vaginas or pubic area.

d. Law enforcement showed ALCANTAR several of the Snapchat conversations and images described above, between the Suspect Snapchat Account and various other Snapchat accounts. ALCANTAR stated that he recognized some of the victims and received some of the images shown.

e. ALCANTAR informed law enforcement that he deleted the Snapchat and TextNow applications previously installed on his cellular phone when he observed law enforcement knocking on the door of the Aurora Residence. ALCANTAR further stated that he deleted images from his cellular phone upon law enforcement's arrival, including sexually explicit images of a minor who he knew was a minor.

f. With respect to the image described in Paragraph 12.e. above, ALCANTAR admitted to telling other Snapchat users, who he knew to be minors,

that he had an ex-girlfriend who carved the letter “E,” into her thigh, and he found that attractive, “to prove they were his.”

g. ALCANTAR admitted he pretended to be younger than he actually is while communicating with minor victims via the Suspect Snapchat Account. ALCANTAR told law enforcement that he did so because it was hard to talk to individuals his age, and he did not want to seem older than the minor victims he spoke to over Snapchat.

II. CONCLUSION

26. Based on the foregoing, I respectfully submit that there is probable cause to believe that, on or about March 31, 2024, RAMON EDUARDO ALCANTAR knowingly received child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), using a means and facility of interstate and foreign commerce, and which image had been shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2)(A).

FURTHER AFFIANT SAYETH NOT.

/s/ Shonnisha Davis (by SH)

SHONNISHA DAVIS

Special Agent, Federal Bureau of
Investigation

SWORN TO AND AFFIRMED by telephone December 3, 2024.

Sheila Finnegan
Honorable SHEILA FINNEGAN
United States Magistrate Judge